

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

BKY No. 03-31304
ADV. No. 04-3112

In Re:

Alan Curtis Gruidl and Jacqueline Ann Gruidl,

Debtors.

Randall L. Seaver, Trustee,

Plaintiff,

**NOTICE OF MOTION AND
MOTION FOR LEAVE TO
WITHDRAW**

vs.

Gregory A. Wade, Richard T. Wade and
Two Brothers Entertainment, Inc.,

Defendants.

1. Foley & Mansfield, PLLP, by and through Thomas J. Lallier, Joseph M. Barnett and Samuel S. Rufer, move the Court for the relief requested below, and give notice of hearing herewith.

2. The Court will hold a hearing on this motion at 11:00 o'clock, a.m., on the 7th day of September, 2004, before the Honorable Gregory F. Kishel, Courtroom No. 228B, at the United States Courthouse, 316 North Robert Street, St. Paul, Minnesota, 55101.

3. Any response to this motion must be filed and delivered not later than September 4, 2004, which is three days before the time set for the hearing (excluding Saturdays, Sundays and holidays), or filed and served by mail not later than August 31, 2004, which is seven days before the date set for the hearing (excluding Saturdays, Sundays and holidays). UNLESS A RESPONSE

OPPOSING THE MOTION IS TIMELY FILED, THE COURT MAY GRANT THE MOTION WITHOUT A HEARING.

4. This motion is filed pursuant to Bankruptcy Rule 9010-3(e)2, and 9013-2 and Movants request leave to withdraw.

5. This case was filed as a voluntary case under Chapter 7 of the United States Bankruptcy Code, and the case is now pending in this Court. This Court has jurisdiction over this motion pursuant to 28 U.S.C. §§ 1334 and 157(a), Local Rule 1070-1, Fed. R. Bankr. P. 5005 and applicable rules. This is a core proceeding.

6. Movants are the attorneys of record for Gregory A. Wade, Richard T. Wade, and Two Brothers Entertainment, Inc.

7. Gregory A. Wade, Richard T. Wade, and Two Brothers Entertainment, Inc. have requested that Movants no longer represent them in this matter.

8. Gregory A. Wade, Richard T. Wade, and Two Brothers Entertainment, Inc. have not produced any documents or responses to discovery requests from the Plaintiff.

9. Movants believe that Gregory A. Wade and Richard T. Wade intend to file bankruptcy as a result of this litigation.

WHEREFORE, Movants move the Court for an order granting leave to withdraw.

Dated: August 10, 2004

FOLEY & MANSFIELD, PLLP

By: /s/ Joseph M. Barnett
Thomas J. Lallier (#1630410)
Joseph M. Barnett (#0314493)
Samuel S. Rufer (#330735)
250 Marquette Avenue, Suite 1200
Minneapolis, MN 55401
T: 612/338-8788

Affidavit of Service by U.S. Mail and Facsimile

STATE OF MINNESOTA)
) ss:
COUNTY OF HENNEPIN)

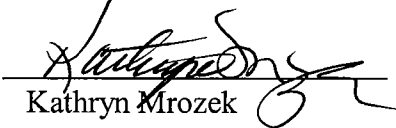
Kathryn Mrozek, of the law firm of Foley & Mansfield, PLLP, in the City of Minneapolis, State of Minnesota, being first duly sworn, states that on the 10th of August, 2004, she served upon counsel for Plaintiff, and upon the Defendants, the attached Notice of Motion and Motion for Leave to Withdraw, together with this Affidavit of Service, by placing a true and correct copy in the United States Mail at Minneapolis, Minnesota, addressed as follows:

Andrea M. Hauser, Esq.
Randall L. Seaver, Esq.
Fuller Seaver & Remette, P.A.
12400 Portland Avenue South, Suite 132
Burnsville, MN 55337

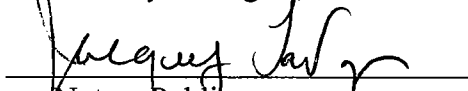
Richard Wade
7419 - 143rd St. Ct.
Apple Valley, MN 55124

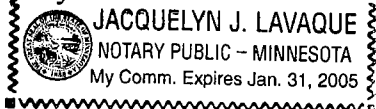
Gregory Wade
1645 East Camelback Road #102
Phoenix, AZ 85016

the last known address of said parties, and also via facsimile upon Counsel, by sending a true and correct copy via facsimile to said counsel at 952/890-0244.


Kathryn Mrozek

Subscribed and sworn to before me
this 10th day of August, 2004



Notary Public

JACQUELYN J. LAVAQUE
NOTARY PUBLIC - MINNESOTA
My Comm. Expires Jan. 31, 2005

Seaver v. Gregory A. Wade, et al., File No. 2714-1

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Defendants.

ORDER FOR RELIEF

The above-entitled matter came before the Court for hearing, on September 7, 2004, at 11:00 o'clock a.m., on the motion of Foley & Mansfield, PLLP, by and through Thomas J. Lallier, Joseph M. Barnett and Samuel S. Rufer ("Movants") seeking leave to withdraw. Appearances were noted in the Court's record. Based upon the proceedings had on said date, the statements of counsel, and all of the files and records herein, the Court now finds that cause exists entitling Movants to the relief requested.

NOW, THEREFORE, IT IS HEREBY ORDERED that Movant is granted leave to withdraw from representing Defendants.

Dated: _____

Gregory F. Kishel
United States Bankruptcy Judge